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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LD, DB, BW, RH, and CJ, on behalf of themselves and all others similarly situated,

Plaintiffs,

V.

21 UNITEDHEALTHCARE INSURANCE
COMPANY, a Connecticut Corporation,
22 UNITED BEHAVIORAL HEALTH, a
California Corporation, and MULTIPLAN,
23 INC., a New York Corporation,

Defendants.

Case No. 4:20-cv-02254-YGR

**JOINT STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
OMNIBUS STIPULATION AND
OMNIBUS MOTION ON DISPUTED
SEALING REQUESTS**

Hon. Yvonne Gonzalez Rogers

Hearing: None Set

Complaint filed: April 2, 2020
Third Amended Complaint filed: Sept. 10, 2021

1 Plaintiffs LD, DB, BW, RH, and CJ, and Defendants United Behavioral Health,
 2 UnitedHealthcare Insurance Company, and MultiPlan, Inc. (together, “Defendants”), collectively
 3 the “Parties” to the above-entitled action, jointly submit this stipulation pursuant to the Post-
 4 Briefing Omnibus Sealing Procedures in this Court’s Standing Order in Civil Cases. In further
 5 support of this Stipulation, the Parties state as follows:

6 **WHEREAS**, on February 13, 2024, the Court issued its Order Granting Modified Sealing
 7 Procedures requiring the Parties to “jointly file an omnibus sealing motion within 14 days after the
 8 conclusion of the briefing sequence” (Dkt. No. 399 at 3);

9 **WHEREAS**, on June 26, 2024, the Court granted Defendants’ Motion to File a Sur-
 10 Reply, allowed Plaintiffs to file a Reply to the Sur-Reply by July 12, 2024 (Dkt. No. 439), and
 11 set July 26, 2024 (14 days after the conclusion of the briefing sequence) as the deadline for the
 12 Omnibus Sealing Stipulation and Omnibus Motions on Sealing Disputes (Dkt. No. 438);

13 **WHEREAS**, on July 12, 2024, Plaintiffs filed their Reply to Defendants’ Sur-Reply (Dkt.
 14 No. 442), which concluded the briefing sequence on class certification;

15 **WHEREAS**, the Court’s Standing Order in Civil Cases allows the Parties “by stipulation
 16 filed on the docket, [to] extend the time to file the Omnibus [Sealing] Stipulation and Omnibus
 17 Motion[s on Sealing Disputes] to 21 days after the conclusion of briefing,” which would be August
 18 2, 2024, with extensions beyond 21 days requiring approval by the Court;

19 **WHEREAS**, the Parties have agreed to extend the deadline for the Omnibus Sealing
 20 Stipulation and Omnibus Motions on Sealing Disputes (if necessary) from July 26, 2024 to August
 21 9, 2024 in light of the voluminous record requiring substantial time for the Parties to meet and
 22 confer, including ongoing efforts by the Parties to reach agreement on as many sealing requests as
 23 possible;

24 **WHEREAS**, the extension of the deadline will not alter the date of any other event or any
 25 other deadline already fixed by Court order;

26 **NOW, THEREFORE**, the Parties hereby stipulate and agree as follows:

27 The deadline for the Omnibus Sealing Stipulation and Omnibus Motions on Sealing

28

1 Disputes (if necessary) currently scheduled for July 26, 2024 is extended to August 9, 2024. If
2 additional time is required for the Parties to meet and confer to finish preparing these documents,
3 the Parties will promptly seek the Court's approval to extend the deadline beyond August 9, 2024.

4 **IT IS SO STIPULATED.**

5 Respectfully submitted,

6 Dated: July 24, 2024

ARNALL GOLDEN GREGORY LLP

7 By: /s/ Matthew M. Lavin
8 Matthew M. Lavin

9 DL Law Group

10 By: /s/ David M. Lilienstein
11 David M. Lilienstein
Katie J. Spielman

12 *Attorneys for Plaintiffs and the Putative Class*

13 DATED: July 24, 2024

GIBSON, DUNN & CRUTCHER LLP

14 By: /s/ Derek K. Kraft
15 Derek K. Kraft

16 *Attorneys for Defendants United Behavioral
17 Health and United HealthCare Insurance
Company*

18 PHELPS DUNBAR LLP

19 DATED: July 24, 2024

20 By: /s/ Errol J. King, Jr.
21 Errol J. King, Jr.

22 *Attorneys for Defendant MultiPlan, Inc.*

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[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order, the Court
HEREBY ORDERS that deadline for the Omnibus Sealing Stipulation and Omnibus Motions on
Sealing Disputes (if necessary) is extended to August 9, 2024.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2024

The Hon. Yvonne Gonzalez Rogers
UNITED STATES DISTRICT COURT JUDGE

1
2 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**
3

4 Pursuant to Civil Local Rule 5-1(i)(3) of the Northern District of California, I attest that
5 concurrence in the filing of the document has been obtained from each of the other signatories
6 hereto.
7

8 DATED: July 24, 2024
9

10 ARNALL GOLDEN GREGORY LLP
11

12 */s/ Matthew M. Lavin*
13 Matthew M. Lavin
14